

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
OFFICE OF THE ZONING ADMINISTRATOR



June 16, 2017

Meridith H. Moldenhauer
Griffin, Murphy, Moldenhauer & Wiggins, LLP
1912 Sunderland Place NW
Washington DC, 20036

Re: Square 982, Lot 70 (the "Property")

Dear Ms. Moldenhauer:

This letter is in reference to the meetings we had on March 28, 2017 and May 30, 2017, regarding your client's potential redevelopment of the above-referenced property. I would like to this letter to memorialize these discussions.

The Property is located on Lot 70 in Square 982 and has a lot area of 5,667 square feet. The Property is split-zoned: the front 4,200 square feet is in the NC-16 Zone District (the "NC-16 Section"), while 1,467 square feet at the rear of the Property is in the MU-4 Zone District (the "MU-4 Section"). The Property fronts on H Street and has access to an alley. *See*, Zoning Map at **Tab "A"**. A site plan identifying the NC-16 and MU-4 sections is at Sheet ZA-2 of the Architectural Plans at **Tab "B"**.

The Property is 42 feet wide along H Street and 62 feet wide in the rear. The additional width in the rear is due to a 20-foot by 10-foot-wide area that provides access to the Square's alley. The Property is currently improved with a multi-story commercial building that includes an existing façade constructed before 1958 (the "Façade"). The prior use was 5,376 s.f. of retail pursuant to CO 1202967. The Property does not have any off-street parking. Images of the existing floor plans and Façade are included on Sheets ZA-1A to ZA-1B of the Architectural Plans at **Tab "B"**. As shown on those plans, the current structure is approximately 41 feet in height, with a ground floor floor-to-ceiling height of approximately 22 feet-10 inches. The Property is located within 0.25 mile from the H Street streetcar line.

Your client seeks to convert the Property's existing commercial structure into a mixed-use residential building with approximately 4,999 s.f. of retail uses on the ground floor and in the cellar, and 19 residential units in floors 2 to 5 and the penthouse (the "Project").¹ *See*, the Architectural Plans at **Tab "B"**. In addition, your client seeks to retain the existing structure and preserve the Façade. *See*, Sheet ZA-1B of the Architectural Plans at **Tab "B"**. As discussed below, the Project will include certain off-street parking spaces that are not required for the Project, due to the existence of eight (8) grandfathered parking spaces, as established in the

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¹ As the Project will retain portions of the existing structure, it will be considered "New Construction" or a "Building Addition", but not be a "New Building", as that distinction exists in the NC Zone.

December 20, 2016 Zoning Determination letter regarding the Property, which is attached here at **Tab “C”** (the “December 2016 Zoning Determination Letter”).²

In summary, at our meetings, I have found the following:

Compliance with Applicable Development Standards

During our meetings, you have indicated that the Project will comply with the matter-of-right development standards for the NC-16 and MU-4 Zone Districts³ as follows:

Floor Area Ratio (“FAR”) and Bonus Density⁴

Pursuant to Subtitle H § 902.1, the maximum residential FAR in the NC-16 zone district is 2.5 FAR, and the maximum non-residential FAR is 1.5 FAR. The maximum residential density, including the Inclusionary Zoning density bonus, is 3.0 FAR.⁵

FAR is “[T]he ratio of the total gross floor area of a building to the area of its lot; determined by dividing the gross floor area (“GFA”) of all buildings on a lot by the area of that lot.” See, Subtitle B § 100.2. FAR is measured by dividing the total GFA of all buildings on a lot by the area of that lot and is indicative of the density permitted on a lot. See, Subtitle B § 303.1.

Pursuant to Subtitle H §§ 902.3 and 902.4, new construction in the NC zone that preserves an existing pre-1958 façade is permitted an additional 0.5 FAR to the maximum overall permitted density (the “FAR façade bonus”). Accordingly, because the Project will preserve the Façade, the maximum permissible density would be increased to 3.5 FAR.

As I confirmed in the December 2016 Zoning Determination Letter, FAR applies to lots in their totality. Accordingly, the provisions of Subtitle H apply to lots in their entirety and a redevelopment of a property that preserves the existing pre-1958 façade, to a level deemed satisfactory upon review of the architectural plans⁶, can apply the 0.5 FAR façade bonus to all of the Property’s 5,667 square feet of land area⁷.

Based on the above, the maximum gross square footage of a structure on the Property is 19,834.5 s.f. (5,667 s.f. lot area x 3.5 FAR). The Project proposes 19,321 GSF, which

² The December 2016 Zoning Determination Letter was posted on DCRA’s website on January 4, 2017. Pursuant to Subtitle Y § 302.5 of the District’s Zoning Regulation, the issuance of the December 2016 Zoning Determination Letter and its posting on DCRA’s website constituted the first writing reflecting the administrative decisions contained in that letter.

³ The NC-16 and MU-4 Zones have identical development standards, except for certain density bonuses associated with retaining the Façade and additional height permitted for the ground-floor, 14-foot floor to ceiling height. Because the majority of the Project is located in the NC-16, this letter will review the Project under the Matter of Right standards of that zone.

⁴ It is this office’s understanding that Amendments to the Zoning Regulations regarding façade requirements in the NC-16 zone have been discussed (the “Potential Façade Amendments”). No implications to the Project are anticipated; nevertheless, requirements identified in the Zoning Regulations will need to be satisfied at the time of building permit.

⁵ Except for the façade density bonus, the MU-4 zone permits the same maximum densities as the NC-16 Zone. See Subtitle G § 402.1.

⁶ The 2016 Zoning Regulations currently do not define “preserves” in Subtitle H. However, the Potential Façade Amendment may offer more guidance in the future. Any request to apply the FAR façade bonus will have to satisfy the requirements identified in the Zoning Regulations at the time building permits are filed.

⁷ As stated in the December 2016 Zoning Determination Letter, this interpretation is consistent with a comprehensive reading of Subtitle H, specifically the subsections that reference lots, including but not limited to Subtitle H §§ 900.16, 909.1(d), and 910.1.

equates to an approximate 3.41 FAR ($19,321 / 5667 = 3.41$ FAR). Accordingly, the Project's proposed FAR meets the requirement for the zone.

Height

Pursuant to Subtitle H § 903.1(i), the maximum permitted building height in the NC-16 Zone District is 50 feet.⁸ Subtitle H § 909.1(h-i) permits an additional five (5) feet of height for buildings that front on H Street and provide a ground floor level with a uniform minimum clear floor-to-ceiling height of 14 feet. This bonus increases the maximum, permissible height on the Property to 55 feet.

The Project fronts on H Street and proposes a ground-floor level with a uniform minimum clear floor-to-ceiling height of 15 feet, as shown on Sheets ZA-1B and ZA-7 at **Tab "B"**.⁹ Accordingly, the maximum permissible height for the Project is 55 feet. The elevations on Sheet ZA-7 illustrate that the Project would have a maximum height of 54 feet. Accordingly, the Project satisfies this requirement.

*Closed Court*¹⁰

The Project proposes a closed, interior court for residential uses on floors 2 through 5. There is no court on the ground level. This court satisfies the definition of a "closed court" set out in Subtitle B § 100.2 because it is "surrounded on all sides by the exterior walls of a building or by exterior walls of a building and side or rear lot lines." As shown on the Site Plan at Sheet ZA-2 in **Tab "B"**, the interior court is surrounded on three sides by exterior walls and the lot line of adjacent Lot 65 to the west. Accordingly, the proposed interior court is a closed court.

Court Width: Under Subtitle H § 907.1, a closed court in the NC-16 zone for a building of this type must have a minimum width of four (4) inches per foot of court height and no less than 15 feet of width, and be at minimum 350 square feet in area. In the past, this office has determined that height associated with a penthouse over and above the roof height does not count toward "court height".

Here, because the court begins on the second floor and ends on the fifth floor, the bounding walls of the court are approximately 39 feet in height (Roof elevation of 54 feet – 2nd Floor elevation of 15 feet), as shown on Sheet ZA-7. Therefore, the minimum width of the court is 15 feet ($39 \text{ feet} \times 4/12 = 13 \text{ feet}$, which is less than 15 feet). As shown in the Site Plan at Sheet ZA-2 of **Tab "B"**, the court has a minimum width of 21 feet-6 inches. Accordingly, the court satisfies the zone's minimum width requirement for a closed court.

Court Area: Furthermore, pursuant to Subtitle H § 907.1, the minimum area of a closed court is "twice the square of the required width of court dimension." Accordingly, the minimum closed court area is 450 s.f. (15-foot width x 15-foot width x 2). In this case, as shown in the Site Plan at Sheet ZA-2 of **Tab "B"**, the Project provides a closed court that is 742 s.f. in size, which is more than the required minimum area. Accordingly, the Project satisfies the zone's closed court requirement.

⁸ The maximum height in the MU-4 zone is also 50 feet in height. See Subtitle G § 403.1.

⁹ As refereed above and illustrated on Sheet ZA-1B, the existing floor to ceiling height is approximately 22 feet-10 inches. Accordingly, the new, 15-foot floor to ceiling height will allow a new curtain wall to match and replace the existing curtain wall, as illustrated on Sheet ZA-1B.

¹⁰ The MU-4 and NC-16 Zone Districts have identical court requirements. See Subtitle G § 202.1.

Penthouse Height

Under Subtitle H § 903.2, the maximum permitted penthouse height in the NC-16 Zone District is 12 feet, except 15 feet for penthouse mechanical space. This regulation limits the habitable penthouse to one story, and a second story is permitted for penthouse mechanical space.¹¹

As shown in the elevation on Sheet ZA-7 of **Tab “B”**, the Project proposes an 11-foot-9-inch tall, habitable penthouse with an approximately 3-foot-tall story for penthouse mechanical space. Accordingly, the penthouse’s maximum height of 14 feet-9 inches satisfies the requirement for the zone.

Penthouse Setback

As shown on Sheets ZA-2 and ZA-6 of **Tab “B”**, the proposed penthouse will satisfy the penthouse setback requirements of Subtitle C § 1502.1(a), (b) and (c). The 11-foot-9-inch habitable penthouse will be set back 12 feet from the front and rear building walls of the roof upon which it is located, as required by Subtitle C §§ 1502.1(a) and (b). No side setback is required from the east roof wall (adjacent to Lot 57) because the Property adjoins another building with an equal permitted matter-of-right building height. See Subtitle C § 1502.1(d). A 1: ½ side setback is required from the west roof wall (adjacent to Lot 65) pursuant to Subtitle C §§ 1502.1(d). As shown on Sheets ZA-2 and ZA-6 of **Tab “B”**, the penthouse provides a west side setback of 5 feet-11 inches, in satisfaction of that requirement.

Yards

No side yard is required in the NC-16 Zone District other than for a detached or semi-detached dwelling. Subtitle H § 906.1. Here, the Project has no side yard and no side yard is required.

The NC-16 and MU-4 Zone Districts both require a minimum 15 foot rear yard. Subtitle H § 905.1; Subtitle G § 405.2. The Project provides a 15-foot-2-inch rear yard, as shown on Sheet ZA-2, thus meeting the rear yard requirements of both zones.¹²

Lot Occupancy

Pursuant to Subtitle H § 904.1, the maximum lot occupancy in the NC-16 Zone District is 70% and 75% for Inclusionary Zoning (“IZ”) for residential uses, and there is no limitation for non-residential uses.¹³ The Project will participate in IZ by satisfying the necessary set aside requirement of Subtitle C § 1003.1. The Project proposes a residential lot occupancy of 71% and a commercial lot occupancy of 74%. Accordingly, the Project satisfies the lot occupancy requirement of the relevant zones.

¹¹ The MU-4 and NC-16 Zone Districts have identical penthouse height requirements. See Subtitle G § 403.2.

¹² As shown on sheet ZA-2, on the ground level, the rear yard is 27 feet-2 inches in length. The Project includes an approximately 12-foot projection into the rear yard area on floors two to five. This projection is permissible because there remains 15 feet-2 inches of rear yard that is “open to the sky from the ground up”.

¹³ The MU-4 and NC-16 Zone Districts have identical lot occupancy requirements. See Subtitle G § 404.1.

Green Area Ratio

As shown on Sheet ZA-1 at **Tab "B"**, the Project will provide a green area ratio of 0.3, which meets the minimum green area ratio ("GAR") of 0.3 that is required in the NC-16 Zone District (Subtitle H § 908.1).¹⁴

Vehicle Parking

- Grandfathered Parking Credits

As determined in the December 2016 Zoning Determination Letter, the Property has eight (8) parking credits that have been grandfathered due to the prior retail use and lack of existing on-site parking spaces. Moreover, as determined in the December 2016 Zoning Determination Letter, "the grandfathered parking credits generated by the prior use can be credited toward the parking requirement for the" Project.

No parking spaces are deemed to be "required" if the Project does not require eight (8) or more parking spaces. *See* Subtitle C § § 705.1-705.2. Accordingly, it is necessary for this office to evaluate whether the number of parking spaces required for the Project exceeds the number of parking credits available. That analysis follows:

- Residential

Pursuant to Subtitle C § 701.5, a residential, multiple dwelling development would need provide one (1) parking space per three (3) dwelling units in excess of four units. Additionally, proximity to streetcar service divides the requirement in half, pursuant to C § 701.2(b).

The Project proposes to construct 19 units. Therefore, without parking credits, three (3) parking spaces would need to be provided ($19 - 4$ (after 4) = 15; $15/3$ (1 sp/3 units) = 5; $5/2$ (streetcar) = $2.5 \rightarrow 3$ spaces).

- Retail

Pursuant to Subtitle C § 701.5, buildings without parking credits containing retail space must provide 1.33 parking spaces per 1,000 s.f. in excess of 3,000 s.f. Additionally, proximity to streetcar service divides the requirement in half, pursuant to C § 701.2(b).

The Project proposes up to 4,999 s.f. of retail space, which will be located in the cellar and first floor. Therefore, without the parking credits, two (2) spaces would be required ($4,999 - 3,000 = 1,999$ sq ft; $1.99 \rightarrow 2 * 1.33 = 2.66 \rightarrow 3$ spaces; $3/2$ (streetcar) = $1.5 \rightarrow 2$ spaces).

- Total

The total required parking for the Project is five (5) spaces. However, as stated above, the Property has eight (8) grandfathered parking credits, which exceeds the number of parking spaces required five (5).

¹⁴ The MU-4 and NC-16 Zone Districts have identical GAR requirements. *See* Subtitle G § 407.1.

Therefore, the Project is not required to provide any spaces pursuant to Subtitle C § 705.1-705.2.

- *Proposed parking spaces that do not serve as required parking spaces for the Project*

The Project proposes one (1) disabled parking space and two (2) car share spaces, which each count as three (3) required parking spaces, pursuant to Subtitle C §§ 701.11; 708.3. Therefore, seven (7) parking spaces are provided (1 disabled space + 6 (2 car share spaces) = 7 spaces).

Due to the existence of the eight (8) parking credits, there is no requirement for parking spaces associated with the Project. Accordingly, the Project's proposed seven (7) parking spaces do not serve as required parking for the Project or any other use.

Bicycle Parking

Pursuant to Subtitle C § 802.1, residential apartments require one (1) long term bicycle parking space for every three (3) dwelling units, one (1) short-term bicycle parking space for every 20 dwelling units, and one (1) short-term bicycle parking space for every 3,500 s.f. of retail space.

The Project proposes 19 units and 4,999 s.f. of retail space. Accordingly, it is required to provide a maximum of six (6) long-term bicycle parking spaces ($19 \text{ units} / 3 = 6.33$, which rounds to 6 spaces pursuant to Subtitle C § 803.3) and one (1) short-term bicycle parking space for the retail uses ($4,999 \text{ s.f.} / 3,500 = 1.43$, which rounds to 1 space pursuant to Subtitle C § 803.3). No short-term bike parking is required for the residential uses because the Project proposes fewer than 20 units.

As shown in the plans at **Tab "B"**, the Project provides long-term space for up to 15 bicycles in an interior bicycle room located in the cellar level. The Project also proposes one (1) short-term bicycle parking space to be located in the public space as determined by DDOT.

Therefore, the Project will provide the necessary bike spaces and thus comply with the bicycle parking requirement.

Loading

Off-street loading facilities are not required for the Project, because it contains fewer than 50 dwelling units and less than 5,000 s.f. of retail space, as shown in Subtitle C § 901.1.

Inclusionary Zoning

Subtitle C § 1001.2(b) states that a development will be subject to IZ requirements when the building proposes new gross floor area that results in ten or more dwelling units. Here, the Project proposes 19 dwelling units in new gross floor area and, therefore, will be required to comply with IZ. The Project will comply with the set asides of Subtitle C § 1003.1 governing at the time of building permit application.

H Street Design Requirements

Subtitle H § 909.1 establishes the design requirements that apply to all new construction for which a building permit is required in the NC-16 zone.

Subtitle H § 909.1(a) requires that buildings shall be designed and built so that not less than seventy-five percent (75%) of the streetwall(s) to a height of not less than twenty-five feet (25 ft.) shall be constructed to the property line abutting the street right-of-way. Buildings on corner lots shall be constructed to both property lines abutting public streets. The Project proposes a streetwall along the entirety of its lot line fronting on H Street NE as shown in the plans contained in **Tab “B”**. It is not located on a corner lot.

Subtitle H § 909.1(d) requires that each new building on a lot that fronts on H Street NE shall devote not less than fifty percent (50%) of the surface area of the streetwall(s) at the ground level of each building to display windows having clear or clear/low-emissivity glass, except for decorative or architectural accent, and to entrances to commercial uses or to the building. The Project is not a “new building”, and accordingly is not required to comply with this regulation.

Subtitle H § 909.1(e) requires that security grilles shall have no less than seventy percent (70%) transparency. Security grilles are not proposed.

Subtitle H § 909.1(f) stipulates that each commercial use with frontage on H Street NE shall have an individual public entrance directly accessible from the public sidewalk. Multiple dwellings unit developments shall have at least one (1) primary entrance on H Street directly accessible from the sidewalk. The Project meets this requirement.

Subtitle H § 909.1(g) requires that buildings shall be designed so as not to preclude an entrance every forty feet (40 ft.), on average, for the linear frontage of the building, excluding vehicular entrances, but including entrances to ground floor uses and the main lobby. The Project meets this requirement.

Subtitle H § 909.1(h) requires that the ground floor level of each new building or building addition shall have a uniform minimum clear floor-to-ceiling height of fourteen feet (14 ft.) if the building fronts H Street NE. The Project, which is a building addition, meets this requirement.

Subtitle H § 909.1(j) requires that projection signs shall have a minimum clearance of eight feet (8 ft.) above a sidewalk and fourteen feet (14 ft.) above a driveway, project no more than three feet, six inches (3 ft., 6 in.) from the face of the building, and end a minimum of one foot (1 ft.) behind the curbline or extension of the curbline. The Project will meet this requirement.

Subtitle H § 909.1(k) requires that façade panel signs shall not be placed so as to interrupt windows or doors and shall project no more than twelve inches (12 in.) from the face of the building. The Project will meet this requirement.

Subtitle H § 909.1(l) prohibits roof signs. None are proposed.

Conclusion

Based on the review of the attached plans and exhibits, the Project complies with the NC-16 and MU-4 Zone District requirements, and may be permitted as a matter-of-right.

Accordingly, when a building permit application for the development is filed, my office will approve it so long as the plans for the Property are substantially consistent with **Tab "B"**, and the zoning maximums set out in those plans are not exceeded. Also, any new Zoning Regulations in effect at the time of filing would need to be satisfied.

This determination letter constitutes the first writing reflecting the administrative decision for the Property. Therefore, under Subtitle Y § 302.5 of the District's Zoning Regulation, no subsequent document, including a building permit or certificate of occupancy, can be appealed unless the document modifies or reverses this letter or reflects a new decision. Please let me know if you have any further questions.

Sincerely,



Matthew Le Grant
Zoning Administrator

Attachments: A –Zoning Map
B – Proposed Architectural Plans
C –December 20, 2016 Zoning Determination letter regarding the Property

File: Det Let re 1107 H St NE to Moldenhauer 6-16-17

ZONING ANALYSIS

SITE INFORMATION

PROJECT ADDRESS: 1107 H STREET NE, WASHINGTON DC 20002

HISTORIC: NOT APPLICABLE

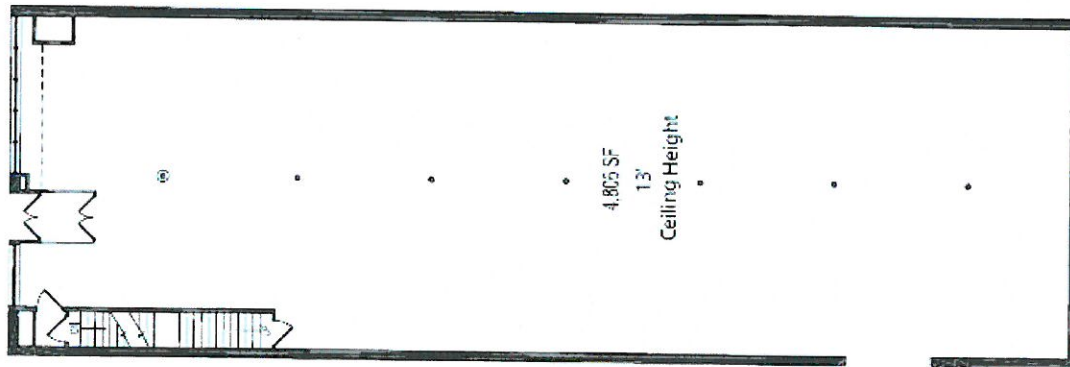
FLOOR	GFA	FAR
CELLAR	5,460 SF	0 SF
FIRST	4,169 SF	4,169 SF
SECOND	4,044 SF	4,044 SF
THIRD	3,924 SF	3,924 SF
FOURTH	3,592 SF	3,592 SF
FIFTH	3,592 SF	3,592 SF
PENTHOUSE	2,203 SF	0 SF
TOTAL:	26,984 SF	19,321 SF

SQUARE	LOT	ZONE	LOT SIZE
0982	0070	NC-16 / MU-4	5,667 SF

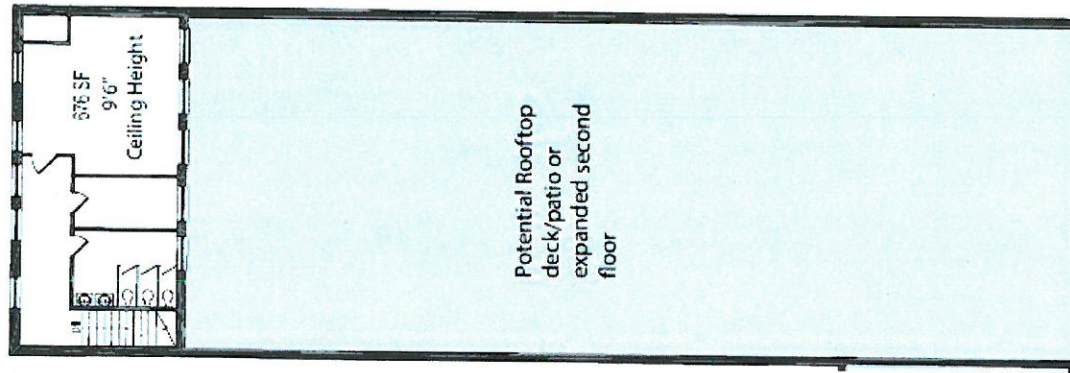
	ALLOWABLE	PROPOSED
LOT SIZE	5,667 SF	5,667 SF
LOT OCCUPANCY	75% (4,250 SF) RESIDENTIAL PER IZ, 100% COMMERCIAL	71% (4,044 SF) RES., 7.4% (4,169 SF) COM.
FAR	3.5 (19,835 SF) PER IZ AND ZR 2016 SUB H 902.3	3.4 (19,321 SF)
PENTHOUSE FAR	0.4 (2,266 SF)	0.4 (2,203 SF)
REAR YARD SETBACK	15'-0"	15'-0"
BUILDING HEIGHT	55'-0" PER 919 SUBTITLE H 909.1	55'-0"
PENTHOUSE HEIGHT	12'-0" EXCEPT 15'-0" FOR PENTHOUSE MECH SPACE	11'-9"
OPEN COURT	4"/1'-0" OF HEIGHT, NOT LESS THAN 10'-0"	NOT APPLICABLE
CLOSED COURT	4"/1'-0" OF HGT, NOT < 15', AREA = 2X SQUARE OF REQ WIDTH, NOT < 350 SF	21'-7 5/8" SMALLER DIMENSION AND 742 SF AREA (HEIGHT OF COURT = 39'-0", MIN DIM = 15', MIN AREA = 450 SF)
RESIDENTIAL PARKING	1 SPACE / 3 DWELLING UNITS IN EXCESS OF 4	NONE REQUIRED*
RETAIL PARKING	1.33 SPACES / 1000 SF IN EXCESS OF 3000 SF	NONE REQUIRED*
LONG TERM BICYCLE PARKING	1 SPACE / 3 DWELLING UNITS	15 SPACES (19 UNITS / 3 = 6 REQUIRED)
SHORT TERM BICYCLE PARKING	1 SPACE / 3500 SF	1 SPACE (PROVIDED IN PUBLIC SPACE)
GAR	0.3	0.3
IZ	10% OF GFA DEDICATED FOR RESIDENTIAL USE OR 75% OF ACHIEVABLE BONUS DENSITY, SEE ZRR SUBTITLE C CHAPTER 10	TBD

*PROPERTY HAS EIGHT (8) GRANDFATHERED PARKING SPACE CREDITS PURSUANT TO DECEMBER 20, 2016 ZONING DETERMINATION LETTER

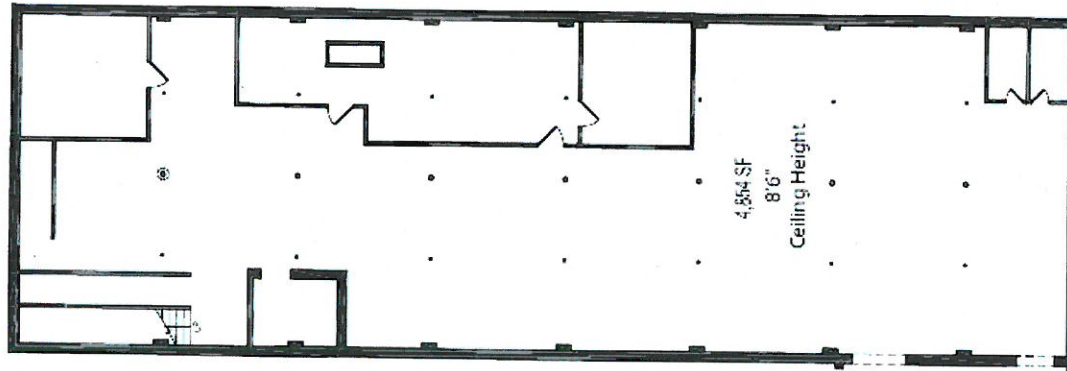
FIRST FLOOR



SECOND FLOOR



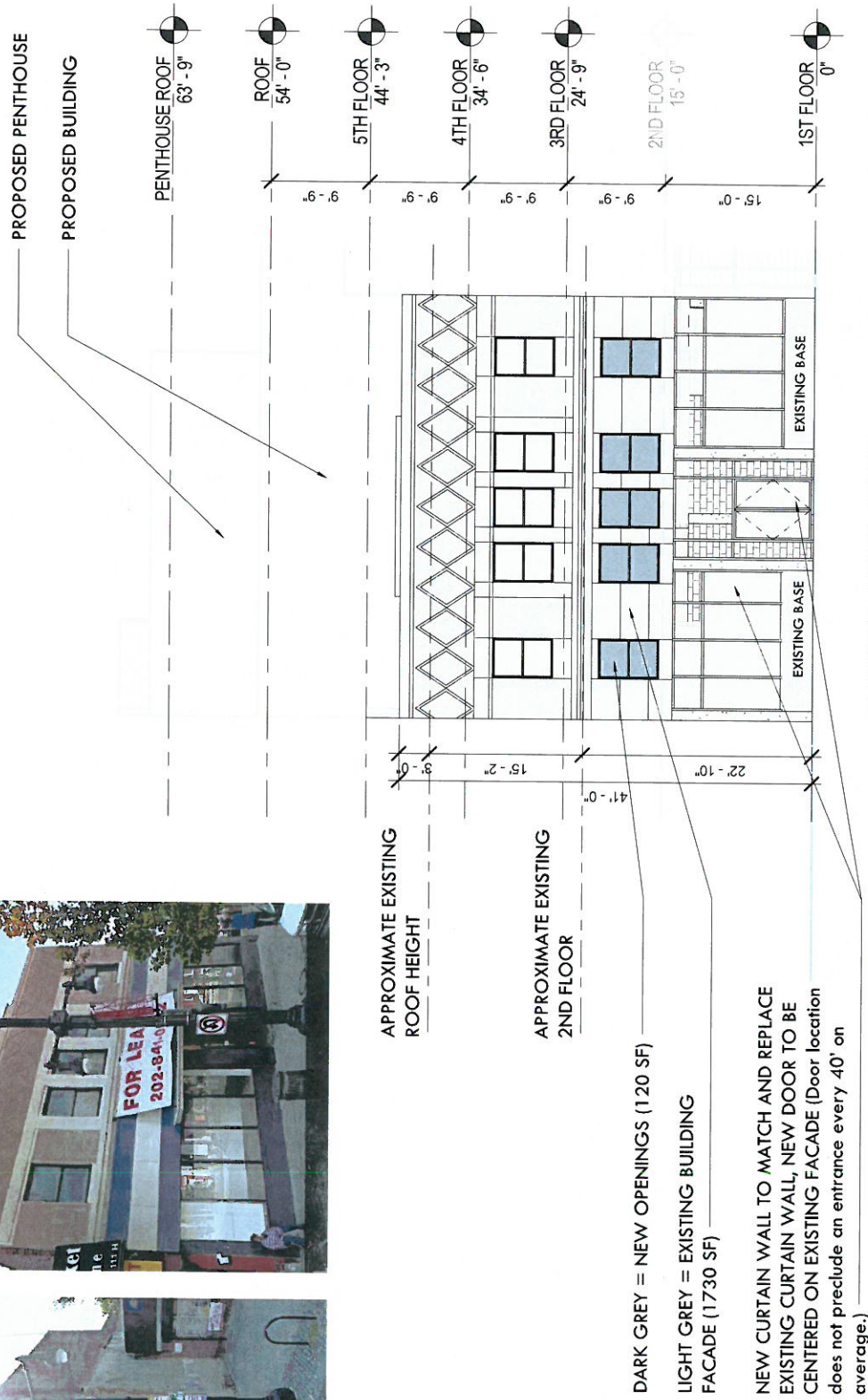
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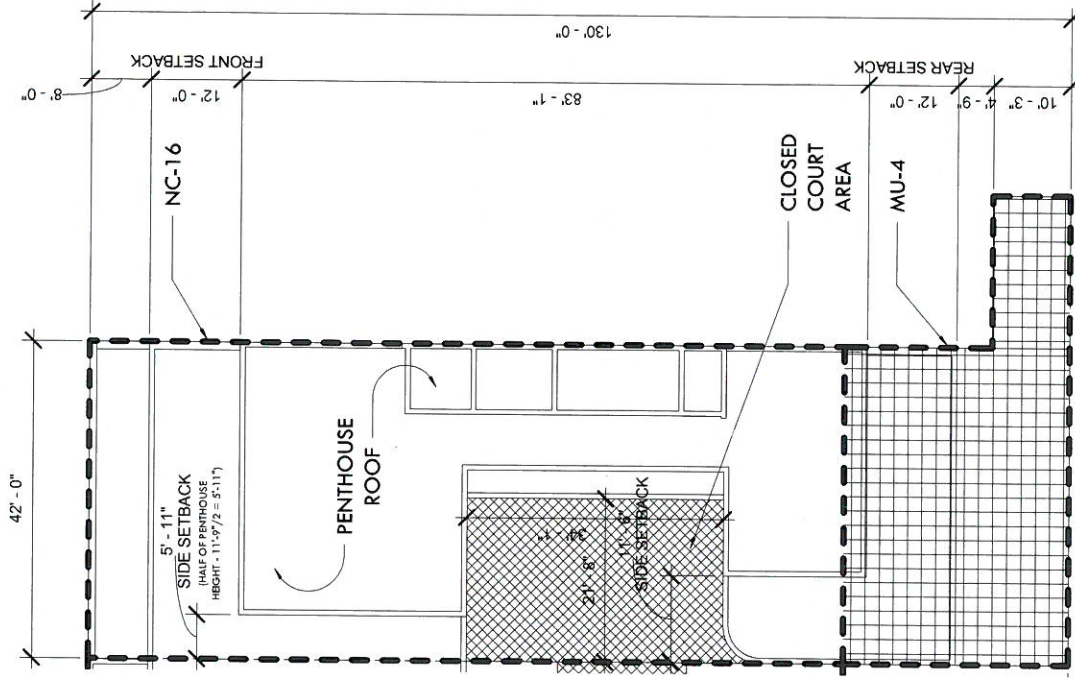


Prior Use: 5,376 s.f. retail thrift store pursuant to CO1202967

Total Grandfathered Parking Calculation Established in December 20, 2016 Zoning Determination Letter

- Parking calculation under 11 DCMR § 2101.1 (1958): 1 space/300 s.f. of gross floor area and cellar floor area in excess of 3,000 s.f. of retail.
- $5,376 \text{ s.f.} - 3,000 = 2,376 / 300 = 7.9$, which rounds up to 8 grandfathered parking spaces.





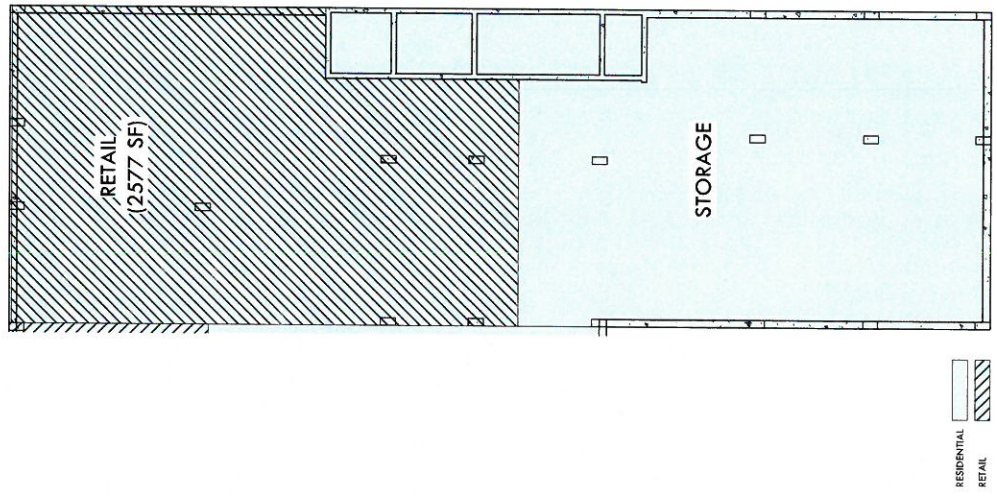
SITE PLAN

ZONING
06.13.17

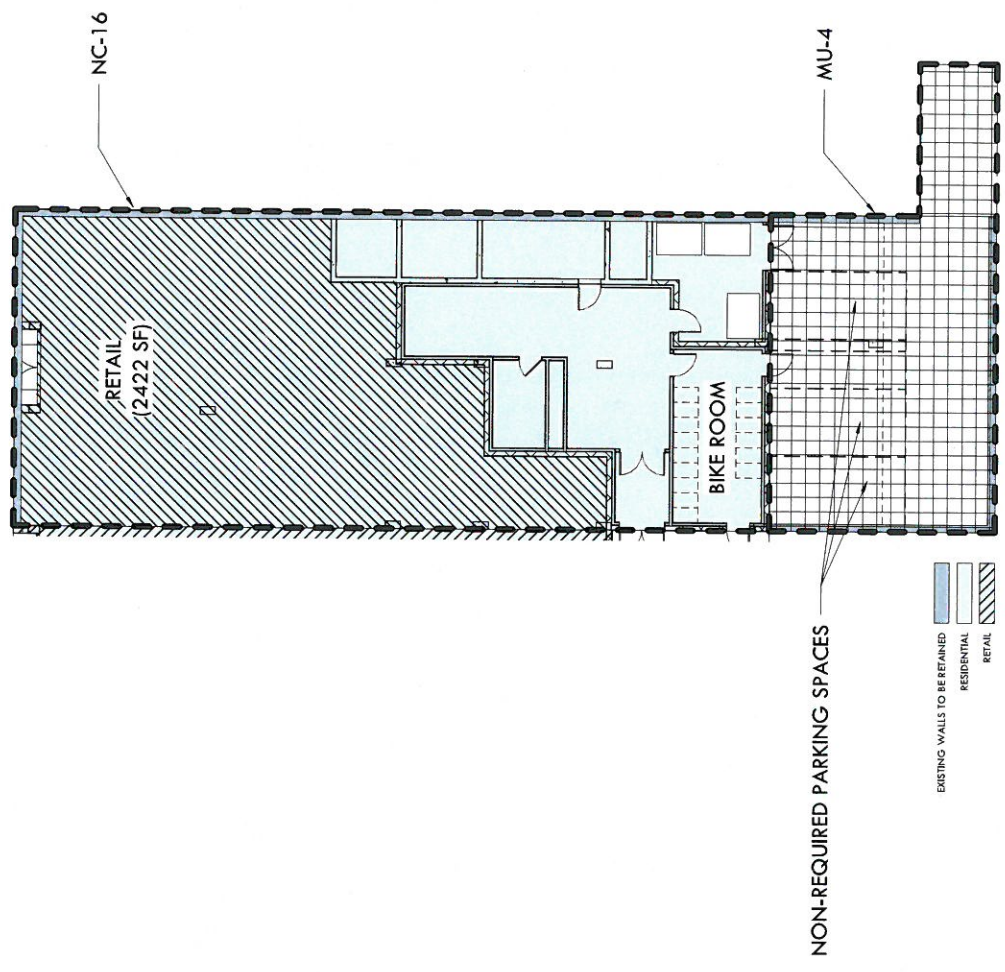
1107 H ST NE
Washington, DC 20002

134 SQUARE 134 ARCHITECTS
1107 H ST NE, Suite A, Washington DC 20002
202.362.5235

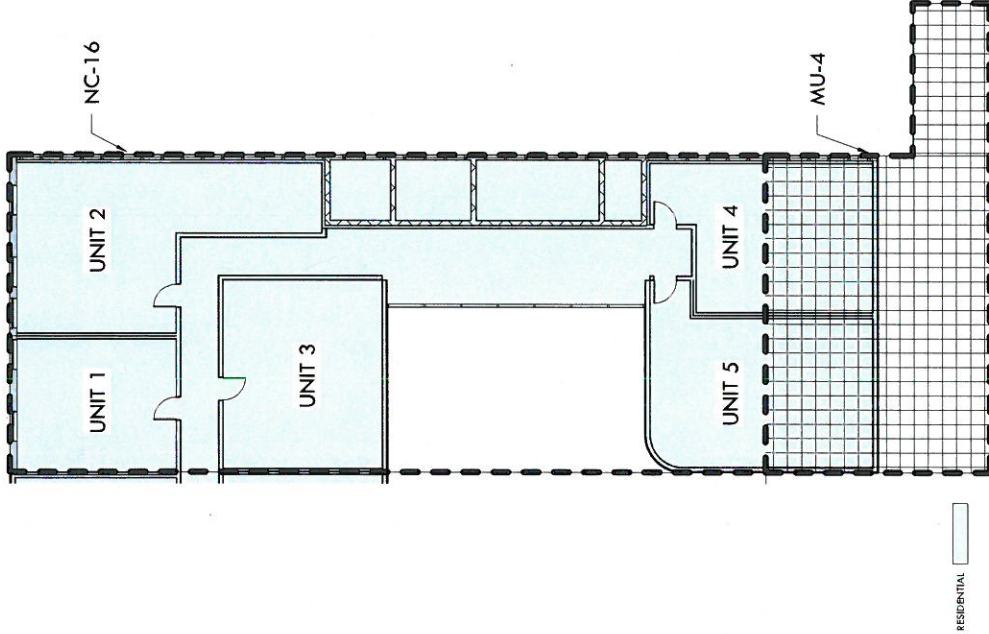
ZA-2



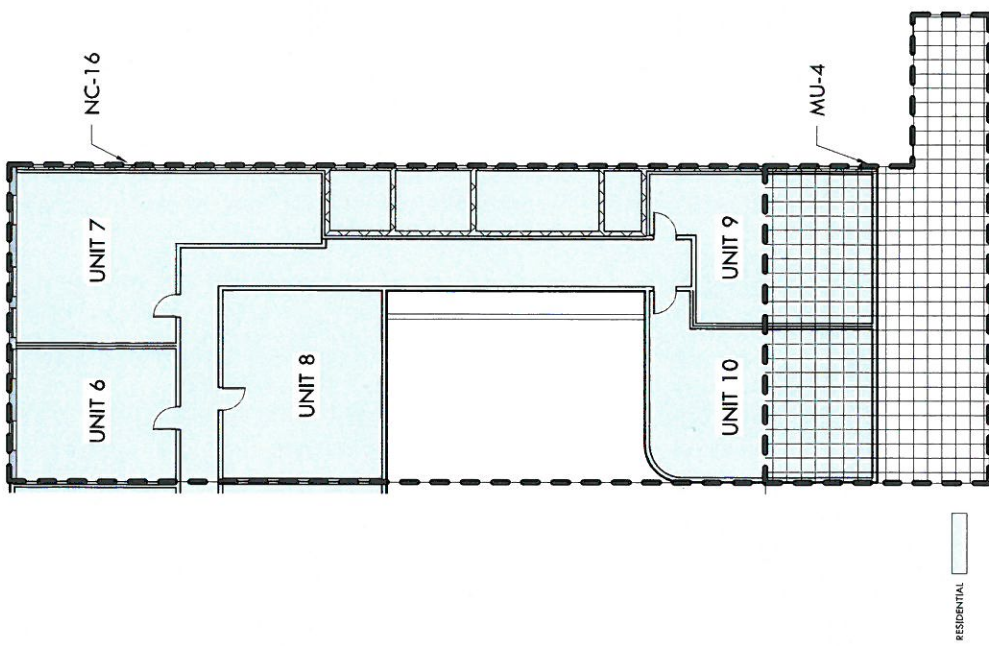
PLAN - CELLAR
1/16" = 1'-0"



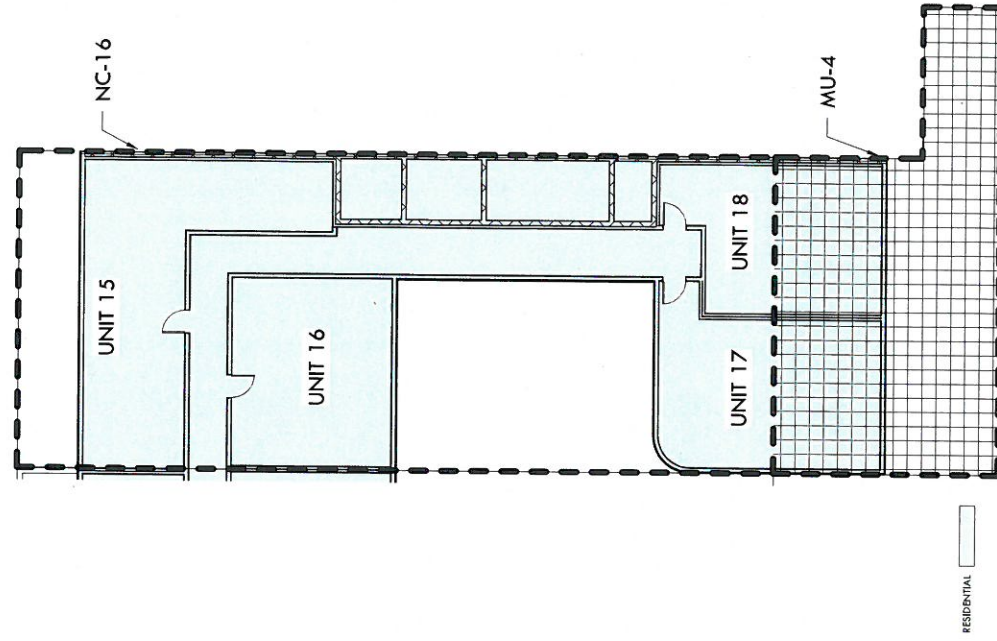
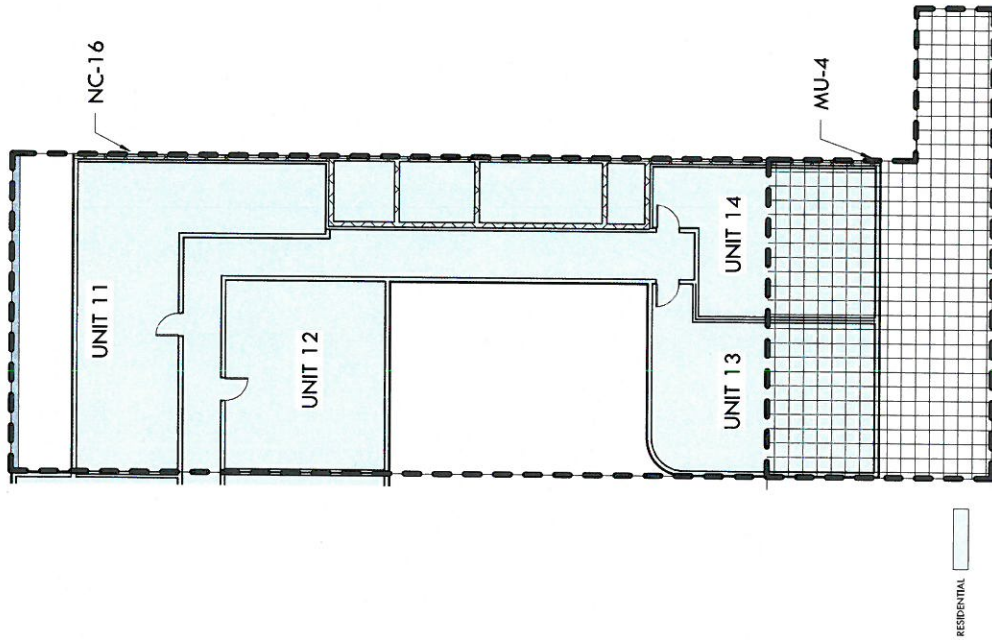
PLAN - 1ST FLOOR
1/16" = 1'-0"

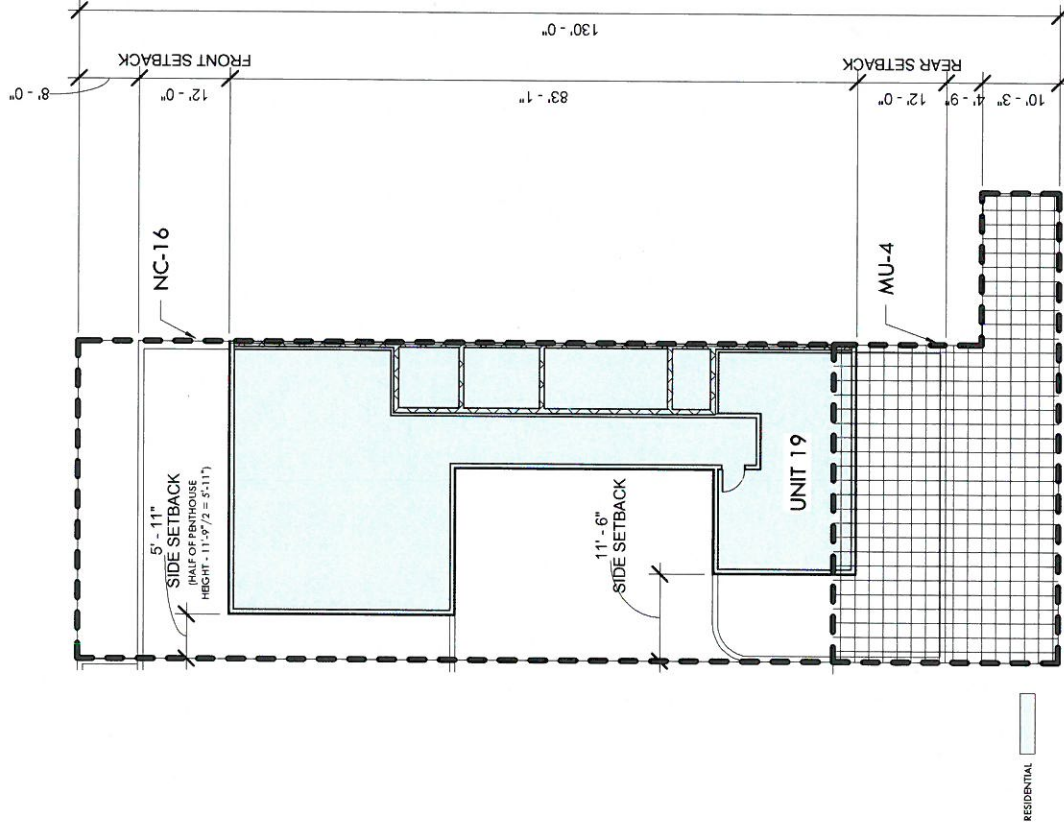


PLAN - 2ND FLOOR
1/16" = 1'-0"

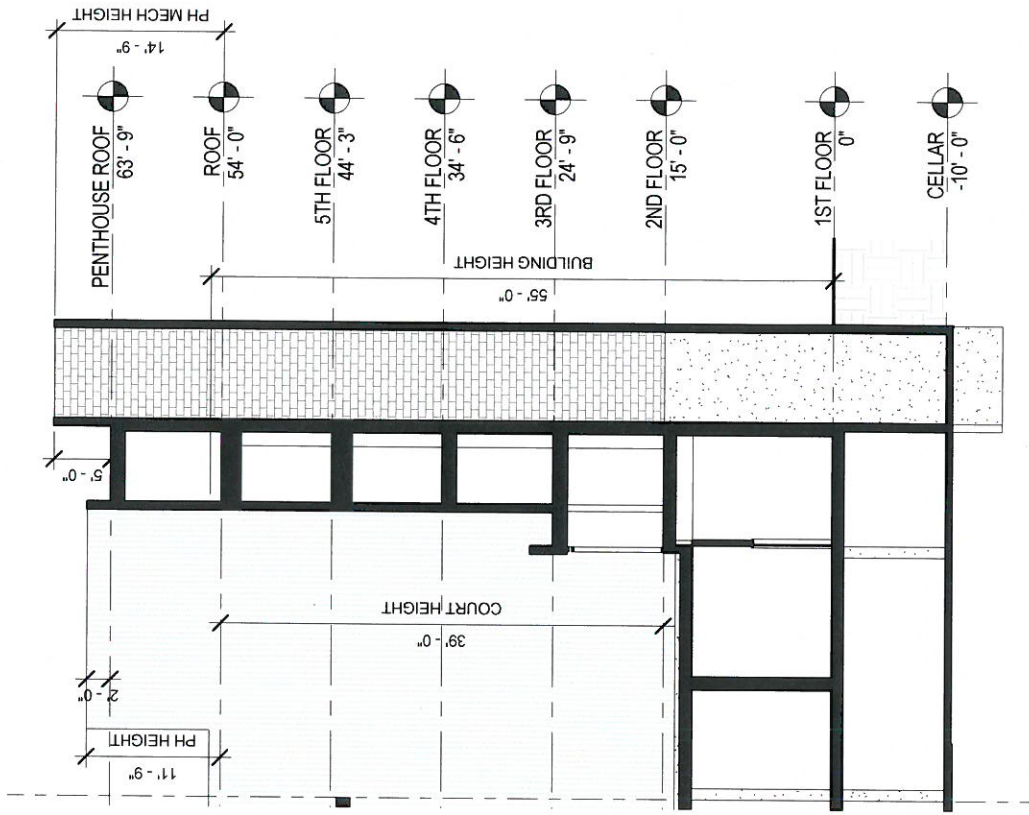


PLAN - 3RD FLOOR
1/16" = 1'-0"





PLAN - PENTHOUSE ROOF / ROOF
1/16" = 1'-0"



SECTION / ELEVATION

ZONING
06.13.17

1107 H ST NE
Washington, DC 20002

SQUARE 134 ARCHITECTS
D.C. 1107 H ST NE, Suite 3, Washington, DC 20002
202.527.1734

134

ZA-7